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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Eulaine Watkins,  
  
Plaintiff,  
  
v.  
  
National Consumer Telecom & Utilities  
Exchange, Inc.; and Dish Network LLC,  
  
Defendants.

Case No.: 2:22-cv-00718-JAD-VCF

**Stipulation for an extension of time for  
Plaintiff to respond to Defendant Dish  
Network LLC's motion to dismiss**

(First request) ECF Nos. 19, 21

Eulaine Watkins ("Plaintiff") and Dish Network LLC ("Defendant and together with Plaintiff as the "parties"), by and through their respective counsel, hereby submit this stipulation for an extension of time for Plaintiff to respond to Defendant's Motion to Dismiss, filed on June 16, 2021. This is the first request for an extension of this deadline.

1 The extension is sought because the parties are working together on a possible  
2 resolution to this matter and are seeking to avoid the additional time and expense of fully  
3 briefing the motion.

4 The parties agree that focusing their respective efforts on working towards resolution  
5 furthers the interests of this litigation and judicial economy. Accordingly, the requested  
6 extension is not being requested in bad faith or to delay these proceedings unnecessarily.

7 The parties therefore stipulate that Plaintiff's opposition to the pending motion shall  
8 be due on or before **July 30, 2022**.

9 Dated: June 30, 2022.

10 **FREEDOM LAW FIRM**

11 /s/ Gerardo Avalos  
12 Gerardo Avalos, Esq.  
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15 *Attorney for Plaintiff Eulaine Watkins*

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17 /s/ Eric Zalud  
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20 Cleveland, OH 44114- 2378  
21 *Attorney for Defendant Dish Network LLC*

22 IT IS SO ORDERED.

23   
24 \_\_\_\_\_  
25 UNITED STATES DISTRICT JUDGE  
26 July 6, 2022  
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